



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 23, 2020

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Ahmed Mohammed El Gammal*, 15 Cr. 588 (ER)

Dear Judge Ramos,

The Government writes to respectfully request a six-day extension of the December 29, 2020 deadline set by the Court to respond to defendant Ahmed Mohammed El Gammal's request for compassionate release (*see* Dkt. 240). The Government has contacted counsel at the Bureau of Prisons ("BOP") to obtain (1) El Gammal's BOP medical records, and (2) information regarding whether El Gammal has exhausted his administrative remedies within the BOP. This information – which the Government has not yet received – is directly relevant to the substance of the Government's response to El Gammal's motion. Accordingly, the Government respectfully requests a brief extension of its deadline so that it can receive and review El Gammal's medical records, obtain information regarding whether he has exhausted his administrative remedies within the BOP, and prepare a more informed response to El Gammal's motion by January 4, 2021. The Government contacted defense counsel earlier this evening to ascertain his position regarding this request and understandably has not yet received a response. Nonetheless, the Government is respectfully submitting its application for the Court's consideration this evening in light of the approaching holiday.

Respectfully submitted,

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cc: Jeremy Gutman, Esq. (by ECF)